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Frontier Airlines, Inc.; Gateway Frontline Services, Inc.; Gateway Group One, Inc.; Daniel Blaise; Jordan Orphan; and Diamond Barrier

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DIANE FLOOD, an individual,

Plaintiff,

vs.

FRONTIER AIRLINES, INC., a foreign corporation; GATEWAY FRONTLINE SERVICES, INC. a foreign corporation; GATEWAY GROUP ONE, INC. a foreign corporation; DANIEL BLAISE, an individual; JORDAN ORPHAN, an individual; DIAMOND BARRIER, an individual, DOES 1 through 20, inclusive, and ROE BUSINESS ENTITIES 1 through 20, inclusive,

Defendants.

Case No. 2:21-cv-00717-JCM-NJK

DEFENDANTS FRONTIER AIRLINES, INC., GATEWAY FRONTLINE SERVICES, INC., GATEWAY GROUP ONE, INC., AND DIAMOND BARRIER'S ANSWER TO PLAINTIFF'S COMPLAINT

Defendants Frontier Airlines, Inc.; Gateway Frontline Services, Inc.; Gateway Group One, Inc.; and Diamond Barrier (hereinafter referred to as "DEFENDANTS" or "These Answering Defendants") by and through their attorneys of record, Lucian J. Greco, Jr., Scott W. Ulm, Esq., and Danielle M. Meriwether, Esq., of the law firm of Bremer Whyte Brown & O'Meara, LLP, hereby responds and answers to Plaintiff's

1 Complaint as follows:

2 **ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

3 1. DEFENDANTS, answering Paragraph 1 of Plaintiff's Complaint, are
4 presently without sufficient information to form a belief as to the truth/veracity of the
5 allegations contained within these paragraphs, and therefore, deny the same.

6 2. DEFENDANTS, answering Paragraph 2 of Plaintiff's Complaint, admits
7 that Frontier Airlines, Inc. is a Colorado Corporation doing business in Nevada. In
8 answering the remainder of the allegations in Paragraph 2 of the Complaint,
9 Defendants are presently without sufficient information to form a belief as to the
10 truth/veracity of the of the allegations contained within these paragraphs, and
11 therefore, deny same.

12 3. DEFENDANTS, answering Paragraph 3 of Plaintiff's Complaint, admits
13 that Gateway Frontline Services, Inc. is a New Jersey Corporation doing business in
14 Nevada. In answering the remainder of the allegations in Paragraph 3 of the Complaint,
15 Defendants are presently without sufficient information to form a belief as to the
16 truth/veracity of the of the allegations contained within these paragraphs, and
17 therefore, deny same.

18 4. DEFENDANTS, answering Paragraph 4 of Plaintiff's Complaint, admits
19 that Gateway Group One, Inc. is a New Jersey Corporation doing business in Nevada.
20 In answering the remainder of the allegations in Paragraph 4 of the Complaint,
21 Defendants are presently without sufficient information to form a belief as to the
22 truth/veracity of the of the allegations contained within these paragraphs, and
23 therefore, deny same.

24 5. DEFENDANTS, answering Paragraph 5 of Plaintiff's Complaint, are
25 presently without sufficient information to form a belief as to the truth/veracity of the
26 allegations contained within these paragraphs, and therefore, deny the same.

27 6. DEFENDANTS, answering Paragraph 6 of Plaintiff's Complaint, are
28 presently without sufficient information to form a belief as to the truth/veracity of the

1 allegations contained within these paragraphs, and therefore, deny the same.

2 7. DEFENDANTS, answering Paragraph 7 of Plaintiff's Complaint, deny
3 each and every allegation contained therein, as Defendant, Diamond Barrier is a
4 resident of Georgia. As to the remaining allegations contained in this paragraph,
5 DEFENDANTS are presently without sufficient information to form a belief as to the
6 truth/veracity, and therefore, deny the same.

7 8. DEFENDANTS answering Paragraph 8 of Plaintiff's Complaint, avers
8 that the allegations in said paragraph constitute conclusions of law and do not require
9 a response. To the extent that this paragraph contains allegations of fact, these
10 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
11 to proof of same.

12 9. DEFENDANTS answering Paragraph 9 of Plaintiff's Complaint, avers
13 that the allegations in said paragraph constitute conclusions of law and do not require
14 a response. To the extent that this paragraph contains allegations of fact, these
15 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
16 to proof of same.

17 10. DEFENDANTS answering Paragraph 10 of Plaintiff's Complaint, avers
18 that the allegations in said paragraph constitute conclusions of law and do not require
19 a response. To the extent that this paragraph contains allegations of fact, these
20 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
21 to proof of same.

22 11. DEFENDANTS answering Paragraph 11 of Plaintiff's Complaint, avers
23 that the allegations in said paragraph constitute conclusions of law and do not require
24 a response. To the extent that this paragraph contains allegations of fact, these
25 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
26 to proof of same.

27 12. DEFENDANTS, answering Paragraph 12 of Plaintiff's Complaint, are
28 presently without sufficient information to form a belief as to the truth/veracity of the

1 allegations contained within these paragraphs, and therefore, deny the same.

2 13. DEFENDANTS, answering Paragraph 13 of Plaintiff's Complaint, are
3 presently without sufficient information to form a belief as to the truth/veracity of the
4 allegations contained within these paragraphs, and therefore, deny the same.

5 14. DEFENDANTS, answering Paragraph 14 of Plaintiff's Complaint, are
6 presently without sufficient information to form a belief as to the truth/veracity of the
7 allegations contained within these paragraphs, and therefore, deny the same.

8 15. DEFENDANTS, answering Paragraph 15 of Plaintiff's Complaint, are
9 presently without sufficient information to form a belief as to the truth/veracity of the
10 allegations contained within these paragraphs, and therefore, deny the same.

11 16. DEFENDANTS answering Paragraph 16 of Plaintiff's Complaint, avers
12 that the allegations in said paragraph constitute conclusions of law and do not require
13 a response. To the extent that this paragraph contains allegations of fact, these
14 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
15 to proof of same.

16 17. DEFENDANTS answering Paragraph 17 of Plaintiff's Complaint, avers
17 that the allegations in said paragraph constitute conclusions of law and do not require
18 a response. To the extent that this paragraph contains allegations of fact, these
19 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
20 to proof of same.

21 18. DEFENDANTS answering Paragraph 18 of Plaintiff's Complaint, avers
22 that the allegations in said paragraph constitute conclusions of law and do not require
23 a response. To the extent that this paragraph contains allegations of fact, these
24 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
25 to proof of same.

26 19. DEFENDANTS, answering Paragraph 19 of Plaintiff's Complaint, is
27 presently without sufficient information to form a belief as to the truth/veracity of the
28 allegations contained within these paragraphs, and therefore, deny the same.

1 20. DEFENDANTS answering Paragraph 20 of Plaintiff's Complaint, avers
2 that the allegations in said paragraph constitute conclusions of law and do not require
3 a response. To the extent that this paragraph contains allegations of fact, these
4 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
5 to proof of same.

6 21. DEFENDANTS, answering Paragraph 21 of Plaintiff's Complaint, are
7 presently without sufficient information to form a belief as to the truth/veracity of the
8 allegations contained within these paragraphs, and therefore, deny the same.

9 22. DEFENDANTS, answering Paragraph 22 of Plaintiff's Complaint, are
10 presently without sufficient information to form a belief as to the truth/veracity of the
11 allegations contained within these paragraphs, and therefore, deny the same.

12 23. DEFENDANTS, answering Paragraph 23 of Plaintiff's Complaint, are
13 presently without sufficient information to form a belief as to the truth/veracity of the
14 allegations contained within these paragraphs, and therefore, deny the same.

15 24. DEFENDANTS, answering Paragraph 24 of Plaintiff's Complaint, are
16 presently without sufficient information to form a belief as to the truth/veracity of the
17 allegations contained within these paragraphs, and therefore, deny the same.

18 25. DEFENDANTS answering Paragraph 25 of Plaintiff's Complaint, avers
19 that the allegations in said paragraph constitute conclusions of law and do not require
20 a response. To the extent that this paragraph contains allegations of fact, these
21 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
22 to proof of same.

23 26. DEFENDANTS answering Paragraph 26 of Plaintiff's Complaint, avers
24 that the allegations in said paragraph constitute conclusions of law and do not require
25 a response. To the extent that this paragraph contains allegations of fact, these
26 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
27 to proof of same.

28 27. DEFENDANTS answering Paragraph 27 of Plaintiff's Complaint, avers

1 that the allegations in said paragraph constitute conclusions of law and do not require
 2 a response. To the extent that this paragraph contains allegations of fact, these
 3 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
 4 to proof of same.

5 28. DEFENDANTS answering Paragraph 28 of Plaintiff's Complaint, avers
 6 that the allegations in said paragraph constitute conclusions of law and do not require
 7 a response. To the extent that this paragraph contains allegations of fact, these
 8 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
 9 to proof of same.

10 29. DEFENDANTS answering Paragraph 29 of Plaintiff's Complaint, avers
 11 that the allegations in said paragraph constitute conclusions of law and do not require
 12 a response. To the extent that this paragraph contains allegations of fact, these
 13 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
 14 to proof of same.

15 **FIRST CAUSE OF ACTION**

16 **(Negligence; Negligence Per Se; Vicarious, Joint-and-Several,**
 17 **Contractual, Statutory, and Legal Liability – Defendants FRONTIER,**
 18 **FRONTLINE, GATEWAY GROPU, BLAISE, ORPHAN, BARRIER,**
 19 **DOES 1-20, ROE BUSINESS ENTITIES 1-20, and each of them)**

20 30. DEFENDANTS, answering Paragraph 30 of Plaintiff's Complaint,
 21 repeats their answers to Paragraphs 1 through 29, and incorporate the same by
 22 reference, as though fully set forth herein.

23 31. DEFENDANTS answering Paragraph 31 of Plaintiff's Complaint, avers
 24 that the allegations in said paragraph constitute conclusions of law and do not require
 25 a response. To the extent that this paragraph contains allegations of fact, these
 26 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
 27 to proof of same.

28 32. DEFENDANTS answering Paragraph 32 of Plaintiff's Complaint, avers

1 that the allegations in said paragraph constitute conclusions of law and do not require
 2 a response. To the extent that this paragraph contains allegations of fact, these
 3 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
 4 to proof of same.

5 33. DEFENDANTS answering Paragraph 33 of Plaintiff's Complaint, avers
 6 that the allegations in said paragraph constitute conclusions of law and do not require
 7 a response. To the extent that this paragraph contains allegations of fact, these
 8 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
 9 to proof of same.

10 34. DEFENDANTS answering Paragraph 34 of Plaintiff's Complaint, avers
 11 that the allegations in said paragraph constitute conclusions of law and do not require
 12 a response. To the extent that this paragraph contains allegations of fact, these
 13 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
 14 to proof of same.

15 35. DEFENDANTS answering Paragraph 35 of Plaintiff's Complaint, avers
 16 that the allegations in said paragraph constitute conclusions of law and do not require
 17 a response. To the extent that this paragraph contains allegations of fact, these
 18 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
 19 to proof of same.

20 **SECOND CAUSE OF ACTION**

21 **(Common Carrier Liability; Vicarious, Joint and Several, Contractual,**
 22 **Statutory, and Legal Liability – Defendants FRONTIER, FRONTLINE,**
 23 **GATEWAY GROPU, BLAISE, ORPHAN, BARRIER, DOES 1-20, ROE**
BUSINESS ENTITIES 1-20, and each of them)

24 36. DEFENDANTS, answering Paragraph 36 of Plaintiff's Complaint,
 25 repeats their answers to Paragraphs 1 through 35, and incorporate the same by
 26 reference, as though fully set forth herein.

27 37. DEFENDANTS answering Paragraph 37 of Plaintiff's Complaint, avers
 28 that the allegations in said paragraph constitute conclusions of law and do not require

1 a response. To the extent that this paragraph contains allegations of fact, these
2 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
3 to proof of same.

4 38. DEFENDANTS answering Paragraph 38 of Plaintiff's Complaint, avers
5 that the allegations in said paragraph constitute conclusions of law and do not require
6 a response. To the extent that this paragraph contains allegations of fact, these
7 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
8 to proof of same.

9 39. DEFENDANTS answering Paragraph 39 of Plaintiff's Complaint, avers
10 that the allegations in said paragraph constitute conclusions of law and do not require
11 a response. To the extent that this paragraph contains allegations of fact, these
12 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
13 to proof of same.

14 40. DEFENDANTS answering Paragraph 40 of Plaintiff's Complaint, avers
15 that the allegations in said paragraph constitute conclusions of law and do not require
16 a response. To the extent that this paragraph contains allegations of fact, these
17 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
18 to proof of same.

19 41. DEFENDANTS answering Paragraph 41 of Plaintiff's Complaint, avers
20 that the allegations in said paragraph constitute conclusions of law and do not require
21 a response. To the extent that this paragraph contains allegations of fact, these
22 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
23 to proof of same.

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THIRD CAUSE OF ACTION

(Negligent Hiring, Contracting, Training, Supervision, Entrustment, Retention; Vicarious, Joint-and-Several, Contractual, Statutory, and Legal Liability – Defendants FRONTIER, FRONTLINE, GATEWAY GROPU, BLAISE, ORPHAN, BARRIER, DOES 1-20, ROE BUSINESS ENTITIES 1-20, and each of them)

42. DEFENDANTS, answering Paragraph 42 of Plaintiff's Complaint, repeats their answers to Paragraphs 1 through 41, and incorporate the same by reference, as though fully set forth herein.

43. DEFENDANTS answering Paragraph 43 of Plaintiff's Complaint, avers that the allegations in said paragraph constitute conclusions of law and do not require a response. To the extent that this paragraph contains allegations of fact, these answering DEFENDANTS deny each and every allegation therein and puts Plaintiff to proof of same.

44. DEFENDANTS answering Paragraph 44 of Plaintiff's Complaint, avers that the allegations in said paragraph constitute conclusions of law and do not require a response. To the extent that this paragraph contains allegations of fact, these answering DEFENDANTS deny each and every allegation therein and puts Plaintiff to proof of same.

45. DEFENDANTS answering Paragraph 45 of Plaintiff's Complaint, avers that the allegations in said paragraph constitute conclusions of law and do not require a response. To the extent that this paragraph contains allegations of fact, these answering DEFENDANTS deny each and every allegation therein and puts Plaintiff to proof of same.

46. DEFENDANTS answering Paragraph 46 of Plaintiff's Complaint, avers that the allegations in said paragraph constitute conclusions of law and do not require a response. To the extent that this paragraph contains allegations of fact, these answering DEFENDANTS deny each and every allegation therein and puts Plaintiff to proof of same.

1 47. DEFENDANTS answering Paragraph 47 of Plaintiff's Complaint, avers
2 that the allegations in said paragraph constitute conclusions of law and do not require
3 a response. To the extent that this paragraph contains allegations of fact, these
4 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
5 to proof of same.

6 48. DEFENDANTS answering Paragraph 48 of Plaintiff's Complaint, avers
7 that the allegations in said paragraph constitute conclusions of law and do not require
8 a response. To the extent that this paragraph contains allegations of fact, these
9 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
10 to proof of same.

11 49. DEFENDANTS answering Paragraph 49 of Plaintiff's Complaint, avers
12 that the allegations in said paragraph constitute conclusions of law and do not require
13 a response. To the extent that this paragraph contains allegations of fact, these
14 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
15 to proof of same.

16 50. DEFENDANTS answering Paragraph 50 of Plaintiff's Complaint, avers
17 that the allegations in said paragraph constitute conclusions of law and do not require
18 a response. To the extent that this paragraph contains allegations of fact, these
19 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
20 to proof of same.

21 51. DEFENDANTS answering Paragraph 51 of Plaintiff's Complaint, avers
22 that the allegations in said paragraph constitute conclusions of law and do not require
23 a response. To the extent that this paragraph contains allegations of fact, these
24 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
25 to proof of same.

26 52. DEFENDANTS answering Paragraph 52 of Plaintiff's Complaint, avers
27 that the allegations in said paragraph constitute conclusions of law and do not require
28 a response. To the extent that this paragraph contains allegations of fact, these

1 answering DEFENDANTS deny each and every allegation therein and puts Plaintiff
2 to proof of same.

3 **AFFIRMATIVE DEFENSES**

4 **FIRST AFFIRMATIVE DEFENSE**

5 These answering Defendants deny the allegations of the Complaint, and each
6 cause of action, and each paragraph in each cause of action, and each and every part
7 thereof, including a denial that the Plaintiff was damaged in the sum or sums alleged,
8 or to be alleged, or any other sum or sums whatsoever.

9 **SECOND AFFIRMATIVE DEFENSE**

10 These answering Defendants believe, and thereon allege, that the Complaint,
11 and each and every cause of action stated therein, fails to state facts sufficient to
12 constitute a cause of action, or any cause of action, as against these answering
13 Defendants.

14 **THIRD AFFIRMATIVE DEFENSE**

15 Plaintiff's Complaint fails to state a claim against these answering Defendants
16 upon which relief can be granted.

17 **FOURTH AFFIRMATIVE DEFENSE**

18 Plaintiff has failed to mitigate her damages, if any.

19 **FIFTH AFFIRMATIVE DEFENSE**

20 Plaintiff's alleged medical expenses were not reasonable and/or necessary
21 and/or causally related to this matter.

22 **SIXTH AFFIRMATIVE DEFENSE**

23 Defendants are informed and believe, and thereon allege, that certain of the said
24 parties have or will enter into settlement agreements with Plaintiff so that in the event
25 that Defendants are held liable to Plaintiff herein, then Defendants are entitled to an
26 offset, in an amount equal to any settlements previously made to Plaintiff by any other
27 party, against any judgment which may be entered herein.

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SEVENTH AFFIRMATIVE DEFENSE

It has been necessary for these answering Defendants to retain the services of an attorney to defend this action, and Defendants are entitled to a reasonable sum as and for attorney's fees.

EIGHTH AFFIRMATIVE DEFENSE

The incidents referred to in Plaintiff's Complaint, and resulting damages, if any, to Plaintiff, were proximately caused or contributed to by the Plaintiff's own negligence, and such negligence was greater than the negligence, if any, of these Answering Defendants, and therefore Plaintiff's claims against Defendants should be deny, or any recovery reduced in proportion to said negligence of Plaintiff.

NINTH AFFIRMATIVE DEFENSE

These answering Defendants are informed and believe, and thereon allege that if these answering Defendants committed any breach of contract said breach was excused by operation of law.

TENTH AFFIRMATIVE DEFENSE

These answering Defendants are informed and believe, and thereon alleges, that if the Plaintiff herein suffered or sustained any loss, injury, damage or detriment, the same is directly and proximately caused and contributed to, in whole or in part, by the breach of warranty, conduct, acts, omissions, activities, carelessness, recklessness, negligence, and/or intentional misconduct of the Plaintiff, thereby completely or partially barring the Plaintiff's recovery herein.

ELEVENTH AFFIRMATIVE DEFENSE

These answering Defendants are informed and believe, and thereon allege, that the claims of Plaintiff are reduced, modified and/or barred by the Doctrine of Unclean Hands.

TWELFTH AFFIRMATIVE DEFENSE

These answering Defendants are informed and believe, and thereon allege, Plaintiff's Complaint, and each and every cause of action contained therein, is barred

1 by the applicable Statutes of Limitation.

2 **THIRTEENTH AFFIRMATIVE DEFENSE**

3 These answering Defendants are informed and believe, and thereon allege,
 4 Plaintiff's unreasonably delayed both the filing of Plaintiff's Complaint and
 5 notification of these answering Defendants to the alleged negligence and the basis for
 6 the causes of action alleged against these answering Defendants, all of which have
 7 unduly and severely prejudiced these answering Defendants in their defense of the
 8 action, thereby barring or diminishing Plaintiff's recovery herein under the Doctrine
 9 of Estoppel.

10 **FOURTEENTH AFFIRMATIVE DEFENSE**

11 These answering Defendants are informed and believe, and thereon allege,
 12 Plaintiff's unreasonably delayed both the filing of Plaintiff's Complaint and
 13 notification of these answering Defendants to the alleged negligence and the basis for
 14 the causes of action alleged against these answering Defendants, all of which have
 15 unduly and severely prejudiced these answering Defendants in their defense of the
 16 action, thereby barring or diminishing Plaintiff's recovery herein under the Doctrine
 17 of Laches.

18 **FIFTEENTH AFFIRMATIVE DEFENSE**

19 Pursuant to N.R.C.P. 11, as amended, all possible affirmative defenses may not
 20 have been alleged herein insofar as sufficient facts were not available for these
 21 answering Defendants after reasonable inquiry, and therefore, these answering
 22 Defendants reserve the right to amend their Answer to allege additional affirmative
 23 defenses, if subsequent investigation so warrants.

24 **SIXTEENTH AFFIRMATIVE DEFENSE**

25 These Answering Defendants are informed and believe, and thereon allege, that
 26 Plaintiff failed to join all necessary and/or indispensable parties to this lawsuit.

27 **SEVENTEENTH AFFIRMATIVE DEFENSE**

28 These Answering Defendants allege that Plaintiff's service of process upon

1 DEFENDANTS have been insufficient.

2 **PRAYER FOR RELIEF**

3 WHEREFORE, Defendants pray for judgment against Plaintiff as follows:

- 4 1. That Plaintiff take nothing by way of her Complaint on file herein;
5 2. That Plaintiff's Complaint be dismissed with prejudice;
6 3. For costs incurred in the defense of this action;
7 4. For reasonable attorney's fees incurred in defending this action; and
8 5. For such other and further relief as the Court may deem just and proper.

9 **JURY DEMAND**

10 Defendants request a trial by jury for all claims so triable.

11 Dated: May 7, 2021

BREMER WHYTE BROWN & O'MEARA
LLP

12
13 By: 

14 Lucian J. Greco, Jr., Esq.
15 Nevada State Bar No. 10600
16 Scott W. Ulm, Esq.
17 Nevada State Bar No. 12652
18 Danielle M. Meriwether
19 Nevada State Bar No. 14924
20 Attorneys for Defendants,
21 *Frontier Airlines, Inc.; Gateway Frontline*
22 *Services, Inc.; Gateway Group One, Inc.;*
23 *Daniel Blaise; Jordan Orphan; and*
24 *Diamond Barrier*
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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of May 2021, a true and correct copy of the foregoing document was electronically delivered to CM/ECF for filing and service upon all electronic service list recipients.



Shannon Formont, an employee of
BREMER WHYTE BROWN &
O'MEARA, LLP